

ROBERT ANDREW WERMUTH  
189991  
PLAINTIFF

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2005 SEP 27 A 9:56

VS.

CV-2:05-cv-644-D

SHANNON CARROL YOUNGBLOOD,  
et., al.,  
DEFENDANT

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MOTION FOR PRODUCTION  
OF DOCUMENTS

Comes now, Plaintiff, ROBERT ANDREW WERMUTH, Pro Se, pursuant to Rule 26, 34, Federal Rules Civil Procedure, and request that the Defendants produce the following documents. Please produce the documents to Plaintiff at EASTERLING CORR. FACILITY, 200 WALLACE DR., CLIO AL 36017. Please note that the term "DOCUMENT" is defined broadly in Federal Rules Civil Procedure, Rule 34(a), and includes regulations, standard operating procedures, memoranda, correspondence, and e-mails.

1) A copy of "USE OF FORCE" incident report as pertaining to the specific case at bar, including forms documenting any medical treatment that was required for the Plaintiff, and or but not limited to photographs, statements, consent to treat forms, ect.

2) A copy of "STANDARD OPERATING PROCEDURE" which governs the use of force, including but not limited to, required training that qualifies a Montgomery Police Officer to use force such as mace, baton, pepper spray, K-9's while effectuating an arrest.

3) A copy of the "STANDING OPPERTING PROCEEDURE" for vehicle pursuit and the rules that govern, training that is required to qualify a Montgomery Police Officer. A full explanation of any kind of defensive or offensive maneuvers that are taught during qualification training that would apply to vehicle pursuit.

4) A copy of all complaints, reviews, or internal investigations, or disciplinary actions brought about within the last 36 months that involve Officer Everette Johnson and Jethro, including but not limited to, their duties involving routine patrol and effectuating arrest.

5) A copy of all complaints, reviews, investigations, or disciplinary actions brought about during the last 36 months that involve Officer Youngblood, including but not limited to vehicle pursuits which involved physical injury to any person or damage to any city or private vehicles.

6) An accurate report of the number of "USE OF FORCE" complaints filed within the last 36 months that involve Montgomery Police Department as a whole.

7) A copy of vehicle maintenance records for one year prior to and one year after September 30, 2003 for the patrol unit that was driven by Officer Youngblood and the patrol unit that was driven by Officers Hill and Horner.

8) all medical documents that reflect the treatment and describe injuries of Officer Welch at the scene of the Kwik Shop and further treatment at Jackson Hospital by Dr. Lansens and or his staff

Pursuant to Rule 26(b)(2), Federal Rules Civil Procedure, a copy of the existence of any liability insurance under which defendants are insured.

I hereby certify that I have served a copy of the foregoing document by causing it to be placed in the U.S. mail, postage prepaid and properly addressed on this 25 day of September 2005 to the following:

KIMBERLY O. FEHL  
CITY OF MONTGOMERY  
LEGAL DEPARTMENT  
103N. PERRT st.  
MONTGOMERY, AL 36104

Robert Andrew Wermuth  
PLAINTIFF

OFFICE OF THE CLERK  
U.S. DISTRICT COURT  
P.O.BOX 711  
MONTGOMERY, AL 36101-0711

ROBERT ANDREW WERMUTH  
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200 WALLACE DRIVE  
CLIO, AL 36017